

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

SCHAEFER SYSTEMS INTERNATIONAL,  
INC.,

Plaintiff,

v.

ALOFT MEDIA, LLC;  
GEORGE STREET PARTNERS;  
TODD SCHMIDT; AND  
GEORGE ANDREW GORDON

Defendant.

C.A. No. 3:22-cv-513-KDB-DCK

**JURY TRIAL DEMANDED**

**DEFENDANT’S OPPOSED MOTION TO DISMISS**

Pursuant to Local Civil Rule 7.1, Fed. R. Civ. P. 12(b)(2)-(3), and this Court’s discretion to decline jurisdiction, Defendant Aloft Media, LLC (“Aloft”) by and through counsel, respectfully moves the Court to dismiss with prejudice Plaintiff’s Complaint in its entirety.

The parties have conferred regarding this motion in accordance with Local Rule 7.1(B) and Plaintiff opposes the requested relief.

Date: January 20, 2023

*s/ Derek Dahlgren*

---

Derek Dahlgren (*pro hac vice*)

Devlin Law Firm LLC

1526 Gilpin Avenue

Wilmington, DE 19806

410-375-7230

Email: ddahlgren@devlinlawfirm.com

J. Douglas Grimes

Allen, Chesson & Grimes

505 N. Church Street

Charlotte, NC 28202

704-755-6012

Email: dgrimes@allenchesson.com

*Attorneys for Defendant*

*Aloft Media, LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ *Derek Dahlgren*

Derek Dahlgren